

Florida River TV Draft Permit V-SU-0022-05.00 Comments

Tanory, Rebecca L. to: Kathleen Paser

05/19/2008 04:07 PM

Cc: "Best, Julie A", Claudia Smith

Bcc: paser.kathleen

Ms. Paser,

BP is taking the opportunity to provide comments on the draft renewal of the Title V operating permit no. V-SU-0022-05.00 for the Florida River Compression Facility.

**1. Statement of Basis, Page 1, Section 1.a - Facility Information: Location -**

a. Change "SE/4, SW/4" to "SE 1/4, SW 1/4".

**2. Statement of Basis, Page 1, Section 1.b - Facility Information: Contacts -**

a. For Facility Contact, change "970-247-6913" to "970-375-7540".

b. For the Company Contact, change "501 Westlake Boulevard" to "501 Westlake Park Boulevard".

**3. Statement of Basis, Page 5, Section 1.e. - Facility Information - List of all units and emission-generating activities, Table 1**

a. Change the serial number for T-1 from "0690-H" to the turbine package number "HC90781". An administrative amendment will be submitted for this change.

b. Change the serial number for T-2 from "0307-H" to the turbine package number "HC93D50". An administrative amendment will be submitted for this change.

**4. Statement of Basis, Page 6, Section 1.e. - Facility Information - List of all units and emission-generating activities, Table 2**

a. Change "1-Dehy #9 Flash Tank" to "1-Dehy #3 Flash Tank".

b. Change "1-238 gal Compressor Oil Drain and Sump" to "1-238 gal Compressor Lube Oil Drain and Sump".

c. Change "1-300 gal Diesel Tank" to "2-300 gal Diesel Tanks". (Note: An additional tank exists at the facility. PTE for this tank is less than 2 tpy of regulated pollutants and less than 0.5 tpy of HAPs. This change qualifies as an Off Permit Change, and because emissions are insignificant, no written notice is required to be submitted to EPA. BP will keep a record of the change that includes emission calculations. Since the tank is less than 75 cubic meters, NSPS Kb does not apply.)

d. Add 1 - 99 hp Emergency Diesel Generator to the Insignificant Emission Units. (Note: The PTE for this unit is less than 2 tpy of regulated pollutants and less than 0.5 tpy of HAPs. This change qualifies as an Off Permit Change, and because emissions are insignificant, no written notice is required to be submitted to EPA. BP will keep a record of the change that includes emission calculations. Additionally, the engine (DMT Corporation, Model DMT-80C, Serial No. 89411-2, was manufactured in October 1989 and does not trigger NSPS IIII because it was constructed prior to July 11, 2005 and manufactured prior to April 11, 2006.)

**5. Statement of Basis, Page 10, Section 3 - Applicable Requirements -**

- a. Under Streamlined Permit Condition, change "II.E.8" to "II.E.7".
- b. Insert an applicability discussion for 40 CFR Part 60, Subpart Dc. This subpart is not applicable. A discussion of the non-applicability was provided in the additional information provided to EPA for the renewal application on January 16, 2006.
- c. Under 40 CFR Part 60, Subpart KKKK, change "The Florida River Compression Facility does not extract natural gas liquids" to "The Florida River Compression Facility does not extract or fractionate natural gas liquids".
- d. Under 40 CFR Part 63, Subpart A, insert applicability to 40 CFR 63.10(b)(3) recordkeeping requirement for applicability determination.

**6. Permit, Page 9, Section I.B. Table 1 - Source Emission Points -**

- a. Change the engine serial number for T-1 from "0690-H" to the turbine package number "HC90781". An administrative amendment will be submitted for this change.
- b. Change the engine serial number for T-2 from "0307-H" to the turbine package number "HC93D50". An administrative amendment will be submitted for this change.

**7. Permit, Page 10, Section I.B. Table 2 - Insignificant Emission Units -**

- a. Change "1-300 gal Diesel Tank" to "2-300 gal Diesel Tanks". (Note: An additional tank exists at the facility. PTE for this tank is less than 2 tpy of regulated pollutants and less than 0.5 tpy of HAPs. This change qualifies as an Off Permit Change, and because emissions are insignificant, no written notice is required to be submitted to EPA. BP will keep a record of the change that includes emission calculations. Since the tank is less than 75 cubic meters, NSPS Kb does not apply.
- b. Add 1 - 99 hp Emergency Diesel Generator to the Insignificant Emission Units. (Note: The PTE for this unit is less than 2 tpy of regulated pollutants and less than 0.5 tpy of HAPs. This change qualifies as an Off Permit Change, and because emissions are insignificant, no written notice is required to be submitted to EPA. BP will keep a record of the change that includes emission calculations. Additionally, the engine (DMT Corporation, Model DMT-80C, Serial No. 89411-2, was manufactured in October 1989 and does not trigger NSPS IIII because it was constructed prior to July 11, 2005 and manufactured prior to April 11, 2006.)

**8. Permit, Page 11, Section II.A. Emission Standards and Limits**

- a. In Part 4(b)(ii), change "Conditions II.E.3, II.E.4, II.E.5(a) and (b), II.E.6(c), and II.E.8" to "Conditions II.E.2, II.E.3, II.E.4(a) and (b), II.E.5(c), and II.E.7".

BP looks forward to any additional discussion or questions raised by these comments. Please advise if you would like a formal comment letter submitted for the file.

Thank you,

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